

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

JAVONNE WILKS,

*Defendant(s)*

Case No.

23-MJ-6252-PAB

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 4/6/22, 9/27/22, and 6/6/23 in the county of Broward and Miami-Dade in the  
Southern District of Florida, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. §§ 2113(a) and 2

Bank Robbery

18 U.S.C. §§ 924(c)(1)(A)(ii) and 2

Brandishing a Firearm During a Crime of Violence

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.



*Complainant's signature*

Ryan Dreibelbis, FBI Special Agent

*Printed name and title*

Sworn to before me and signed in my presence in accordance to  
the requirements of Fed. R. Crim. P. 4.1 by in my presence

Date: 6-7-2023

City and state: Fort Lauderdale, Florida



*Judge's signature*

Panayotta Augustin-Birch, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Ryan Dreibelbis, being duly sworn, depose and state as follows:

**INTRODUCTION**

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have served in this capacity since February 2018. Currently, I am assigned to the Violent Crimes and Fugitive Task Force of the FBI's Miami Division and have been at this location since May 2019. My duties involve investigating bank robberies, Hobbs Act robberies, extortion, kidnappings, and other violations of federal law. Prior to moving to the Miami Division, I served as a Special Agent for the FBI's New York Division where I investigated narcotics trafficking violations. In my current capacity, I have assisted in the execution of search warrants; interviewed subjects, victims, and cooperating individuals; and used historical cell site analysis to locate phones of subjects and victims.

2. I submit this affidavit in support of a criminal complaint against Javonne Wilks ("WILKS"). As explained below, there is probable cause to believe that WILKS violated Title 18, United States Code, Sections 2113(a) (Bank Robbery) and 2, and 924(c)(1)(A)(ii) and 2 (Brandishing a firearm during a crime of violence).

3. The information contained in this Affidavit is based on my personal knowledge, as well as information relayed to me by other law enforcement officials involved in this investigation. I have not included in this affidavit each and every fact known to me about this investigation. Rather, I have included only the facts that are sufficient to establish probable cause to arrest WILKS for the violations described above.

## **PROBABLE CAUSE**

### ***An Armed Robbery is Committed at the Centennial Bank***

4. On April 6, 2022, at approximately 11:20 am, three unknown subjects (collectively referred to as the "SUBJECTS"), one of whom is believed to be WILKS, entered the Centennial Bank, located at 10310 Griffin Road, Cooper City, Florida.<sup>1</sup> The SUBJECTS were all wearing dark colored skull hats, dark face masks, and coveralls. Each of the SUBJECTS was armed with a firearm: two had AR-15 style long guns and one had a handgun. Upon entering the lobby, the SUBJECTS forced two bank employees to lie face down on the ground at gun point. As this occurred, one of the SUBJECTS approached the two bank tellers behind the counter, jumped the counter, and demanded entry into the cash drawers and vault. The bank tellers complied. The SUBJECTS took approximately two hundred forty-two thousand one hundred and thirteen dollars (\$242,113.00) in United States currency. Prior to leaving, the SUBJECTS stole the cellphones belonging to two of the bank employees. At approximately 11:23 am, the SUBJECTS exited the bank and entered a red Nissan Maxima ("Nissan Maxima") before leaving the area. Centennial Bank's security cameras captured and recorded the robbery.

5. On April 6, 2022, after the robbery, law enforcement located the Nissan Maxima abandoned at the 7-Eleven convenience store located at 10000 Griffin Road, Cooper City, Florida. This location is approximately five (5) minutes away from the Centennial Bank. When law enforcement located the Nissan Maxima, officers recognized that it bore Florida license plate BYIT88. Further investigation revealed that the license plate was stolen on or about April 5, 2022, after 5:00pm.

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<sup>1</sup> Centennial Bank is a banking institution whose deposits are insured by the Federal Deposit Insurance Corporation ("FDIC").

6. Law enforcement reviewed surveillance footage of businesses near the 7-Eleven convenience store identified in paragraph 7. Surveillance footage revealed that the SUBJECTS exited the Nissan Maxima and entered a dark colored SUV, unknown make and model (“Unknown SUV”) before fleeing.<sup>2</sup>

7. The Nissan Maxima was forensically processed by law enforcement after it was located. DNA swabs of the front passenger door of the Nissan Maxima were entered into the Combined DNA Index System (CODIS) and matched to Javonne Wilks (“WILKS”).

***The Nissan Maxima Involved in the Centennial Bank Robbery***

8. On April 2, 2022, at approximately 7:00 am, the registered owner of the Nissan Maxima parked the Nissan Maxima at the Tri-Rail Market Station, located at 1200 SE 11th Avenue, Hialeah, Florida 33010.

9. On April 3, 2022, at approximately 11:35 pm, video surveillance from a business near the Tri-Rail Market Station captured a Nissan Altima (“Nissan Altima”) enter the station.

10. On April 3, 2022, at approximately 11:47 p.m., video surveillance captured the Nissan Altima and the Nissan Maxima both exiting the station.

11. On April 3, 2022, at approximately 11:58 pm, a License Plate Reader (“LPR”) located at Northwest 79th Street and Northwest 32nd Avenue, Miami, Florida, captured the Nissan Maxima. The Nissan Altima was captured on the same LPR approximately two seconds later. The LPR records reveal that the Nissan Altima bore license plate number QFDG15. The registered owner of the Altima is WILKS.

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<sup>2</sup> Law enforcement is not able to discern when the Nissan Maxima arrived at the 7-Eleven convenience store or who operated it at the time of its arrival.

12. On April 4, 2022, at approximately 7:00 am, the registered owner of the Nissan Maxima returned to the Tri-Rail Market Station. Unbeknownst to the registered owner, someone had removed the Nissan Maxima from the station without authorization. The owner subsequently notified law enforcement about the theft. At the time of its theft, the Nissan Maxima bore Florida license plate QSPD56.

***A Second, Similar Robbery Occurs at Ocean Bank***

13. On September 27, 2022, at approximately 9:59 am, two unknown subjects (collectively referred to as the "SUBJECTS") entered the Ocean Bank, located at 7455 Miami Lakes Drive, Miami Lakes, Florida ("Ocean Bank").<sup>3</sup> The SUBJECTS' faces were covered during the course of the robbery. Each of the SUBJECTS was armed with a handgun. Upon entering the lobby, one of the SUBJECTS maintained control of the employees and customers in the lobby at gun point. As this occurred, the other SUBJECT jumped the counter and demanded entry into the cash drawers and cash re-cycler. The bank tellers complied. The SUBJECTS took approximately eighty-two thousand two hundred ninety-four dollars (\$82,294.00) in United States currency. Prior to leaving, the SUBJECTS stole a purse belonging to one of the bank employees. At approximately 10:05 am, the SUBJECTS exited the bank and entered a black Chevrolet Traverse ("Chevrolet Traverse") before leaving the area. Ocean Bank's security cameras captured and recorded the robbery.

14. On September 29, 2022, law enforcement located the Chevrolet Traverse abandoned at 7140 Fairway, Miami Lakes, Florida. This location is approximately two (2) minutes away from the Ocean Bank. When law enforcement located the Chevrolet Traverse, officers found

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<sup>3</sup> Ocean Bank is a banking institution whose deposits are insured by the Federal Deposit Insurance Corporation ("FDIC").

that it bore Virginia license plate UCG7745. Further investigation revealed that the license plate was assigned to an AVIS Chrysler Pacifica rental van, which had not been reported stolen.

***The Chevrolet Traverse Involved in the Ocean Bank Robbery***

15. On August 17, 2022, the authorized renter of the Chevrolet Traverse parked the Chevrolet Traverse in a parking garage, located at 250 Southeast 3rd Avenue, Miami, Florida, 33131. At approximately 3:29 pm, video from the interior of the parking garage captured the Chevrolet Traverse exiting the garage.

16. On August 17, 2022, at approximately 3:36 pm, the Sunpass transponder attached to the Chevrolet Traverse sent a notification to the rental car company that the vehicle was on State Road 112 West at 17th Avenue.

17. On August 17, 2022, the authorized renter returned to the garage but could not locate the Chevrolet Traverse. At approximately 4:25 pm, the renter contacted City of Miami Police Department to report the vehicle stolen.

18. In my training and experience, it is not uncommon for criminals to use multiple vehicles to execute coordinated criminal activities. In this case, a stolen vehicle was used in both robberies. This creates numerous crimes scene locations for both robberies; the location of the vehicle theft, the location of the robbery, and the location where the vehicle was discarded.

***Additional Investigation***

19. A review of law enforcement databases associated WILKS with the phone number 786-334-9167 ("Wilks' Number"). In addition, a report generated by Experian attributed Wilks' Number to WILKS. Furthermore, City of Miami reports from July and December of 2020 attribute Wilks' Number to WILKS.

*Cell Site Information*

20. On December 22, 2022, United States Magistrate Judge Jared M. Strauss of the Southern District of Florida authorized a warrant requiring T-Mobile to provide historical cell site information for Wilks' Number. Upon receiving the cell site data from T-Mobile, law enforcement reviewed the data and noted Wilks' Number utilized cell towers in the vicinity of several locations of interest.

21. On April 3, 2022, at 11:47, Wilks' Number utilized a tower in the vicinity of the Tri-Rail at the same date and time when the Nissan Maxima used in the Centennial Bank robbery was stolen. On April 3, 2022, at 11:58 Wilks' Number utilized a cell tower in the vicinity of the License Plate Reader ("LPR") located at Northwest 79th Street and Northwest 32nd Avenue, Miami, Florida, which captured the Nissan Maxima at that same date and time, followed by Wilk's Nissan Altima.

22. On April 4, 2022, two days prior to the Centennial Bank Robbery, between 3:19 PM and 3:20 PM, Wilks' Number utilized a cell phone tower in the vicinity of the Centennial Bank.

23. On April 6, 2022, from 11:15 AM to 11:24 AM, Wilks' Number utilized cell phone towers in the vicinity of the Centennial Bank Robbery. The robbery occurred at approximately 11:20 AM.

24. On November 10, 2022, United States Magistrate Judge Jacqueline Becerra of the Southern District of Florida authorized a warrant requiring T-Mobile and the other major cellular service providers to disclose certain information derived from the cell towers that serviced the area of the Chevrolet Traverse theft and the Ocean Bank robbery. Upon receiving the information from the service providers, law enforcement reviewed the data from T-Mobile and determined that

WILKS' Number utilized a T-Mobile cell tower on August 17, 2022, at 3:28:05 pm EST. This T-Mobile cell tower provided cellular coverage for the location of the Chevrolet Traverse theft.

***Bank Records***

25. On or about December 9, 2022, a Grand Jury subpoena was issued for JP Morgan bank account records belonging to Javonne Wilks. On or about December 16, 2022, JP Morgan produced bank account records between February 1, 2022, and December 6, 2022. During this time period, there were regular payroll deposits and six (6) cash deposits. Records revealed a cash deposit on February 17, 2022, in the amount of \$540.00. In the days following the Centennial Robbery on April 6, 2022, records reveal Wilks deposited \$20,000.00 on April 9, 2022; \$5,300.00 on May 2, 2022; and \$160.00 on May 6, 2022. In the days following the Ocean Bank robbery, JP Morgan bank records revealed Wilks deposited \$4,500.00 on September 28, 2022 and \$2,300.00 on October 11, 2022.

***An Additional Robbery Occurs***

26. On or about June 6, 2023, at approximately 1:20 PM, two black males wearing sweatshirts, long pants, masks, and bicycle helmets entered the Self Help Credit Union at 101 Curtiss Parkway, Miami Springs, Florida. The Self Help Credit Union is insured by the National Credit Union Administration.

27. One male carried a semiautomatic handgun and the other carried a revolver handgun. Upon entering the bank, the SUBJECTS ordered all employees to the lobby while brandishing their firearms. S-1 took two female employees and S-2 took the manager and ordered him to open the vault. The manager told S-2 that he could not open it because the vault was dual-controlled. S-2 told S-1 to bring the other two victim employees to the vault. The head teller and the manager then opened the vault for the SUBJECTS. The SUBJECTS ordered the manager out



of the vault, put him on his knees, and patted him down while asking him if he had a firearm. The head teller, at gunpoint, put money from the vault into the duffel bag brought by the SUBJECTS. At this point, the SUBJECTS demanded more money. The second teller stated she had more money in her drawer, which she then provided to the SUBJECTS. The bank suffered an approximately \$29,000 loss.

28. The SUBJECTS got on their bicycles and fled north away from the bank.

29. On June 5, 2023, at 2:24 PM, and June 6, 2023, at 11:16 AM, WILKS' Nissan Altima was detected by a license plate reader in the immediate vicinity of the Self Help Credit Union.


#### CONCLUSION

30. Based on the above information, I respectfully submit that there is probable cause to believe that WILKS violated Title 18, United States Code, Sections 2113(a) and 2 (Bank Robbery), and 924(c)(1)(A)(ii) and 2 (Brandishing a firearm during a crime of violence).

**FURTHER AFFIANT SAYETH NAUGHT.**

  
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SPECIAL AGENT RYAN DREIBELBIS  
FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1  
by in my presence on this 7<sup>th</sup> day of June, 2023.

  
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PANAYOTTA AUGUSTIN-BIRCH  
UNITED STATES MAGISTRATE JUDGE